

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS**

**UNITED STATES OF AMERICA  
and  
STATE OF ARKANSAS,**

**Plaintiffs,**

**V.**

**EXXONMOBIL PIPELINE COMPANY  
and  
MOBIL PIPE LINE COMPANY,**

## Defendants.

**Civil Action No. 4:13-cv-0355**

## Judge Baker

**Mag. Judge Kearney**

**UNITED STATES' UNOPPOSED MOTION FOR LEAVE TO  
FILE A REPLY BRIEF IN SUPPORT OF ITS MOTION TO  
COMPEL DEFENDANTS TO PROVIDE DISCOVERY RESPONSES**

The United States of America, on behalf of the United States Environmental Protection Agency, respectfully moves the Court for leave to file a reply brief in support of the United States' Motion to Compel Defendants to Provide Discovery Responses, which was filed on March 7, 2014. On March 24, 2014, Defendants filed a Response in Opposition. The United States now seeks leave to file, no later than March 31, 2014, a reply brief addressing Defendants' Opposition. Defendants do not oppose the filing of a reply by the United States. Accordingly, the United States respectfully requests that the Court grant this motion.

Respectfully submitted,

FOR THE UNITED STATES:

ROBERT G. DREHER  
Acting Assistant Attorney General  
Environment and Natural Resources Division  
United States Department of Justice

/s/ Jason T. Barbeau

JASON T. BARBEAU  
Trial Attorney (D.C. Bar #468200)  
ROBYN E. HANSON (N.Y. Bar #4462339)  
EMILY C. POWERS (N.Y. Bar #5132204)  
Environmental Enforcement Section  
Environment and Natural Resources Division  
United States Department of Justice  
P. O. Box 7611 Ben Franklin Station  
Washington, DC 20044  
(202) 616-8908 (Telephone)  
(202) 616-6584 (Facsimile)  
jason.barbeau@usdoj.gov

CHRISTOPHER R. THYER  
United States Attorney  
Eastern District of Arkansas

RICHARD M. PENCE, JR.  
Assistant United States Attorney (Ark. Bar #69059)  
United States Attorney's Office  
Eastern District of Arkansas  
P.O. Box 1229  
Little Rock, AR 72203  
(501) 340-2600 (Telephone)  
richard.pence@usdoj.gov

Of Counsel:

EDWIN QUINONES  
Assistant Regional Counsel  
EPA Region 6  
1445 Ross Avenue, Suite 1200, 6RC-S  
Dallas, TX 75202-2733

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2014, a copy of the UNITED STATES' UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF ITS MOTION TO COMPEL DEFENDANTS TO PROVIDE DISCOVERY RESPONSES was filed and served through the Court's electronic case filing system (CM/ECF), which shall send notification to the following:

N.M. Norton, Jr.  
Stephen R. Lancaster  
Justin T. Allen  
Wright, Lindsey, & Jennings LLP  
200 West Capitol Avenue, Suite 2300  
Little Rock, Arkansas 72201-3699  
Slancaster@wlj.com  
JAllen@wlj.com

Timothy K. Webster  
Roger R. Martella  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8000 (telephone)  
(202) 736-8111 (facsimile)  
twebster@sidley.com

*Counsel for Defendants*

/s/ Jason T. Barbeau